

JBN Telephone Company, Inc.
Line 920 – Tribal Land Issues

As required in 47 C.F.R. § 54.313(a)(9), the following provides the detailed description of the efforts by the Company related to discussions with Tribal governments that, at a minimum, included: (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements. Tribal business and licensing requirements include business practice licenses that Tribal and non-Tribal business entities, whether located on or off Tribal lands, must obtain upon application to the relevant Tribal government office or division to conduct any business or trade, or deliver any goods or services to the Tribes, Tribal members, or Tribal lands. These include certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government licensure.

Line 921 – Needs Assessment and Deployment Planning: The Company's actions to address needs assessment and deployment planning with a focus on tribal community anchor institutions for the tribal land network are as follows: On November 12, 2012 the Company sent a letter regarding the Company's Tribal Outreach Initiative to the Navajo Nation – Alamo Chapter (see Attachment A). It was sent to the Navajo Nation's President, the Alamo's President and Vice President and the new Navajo Nation Telecommunications Regulatory Commission. The Company followed up the letter with a presentation to the Alamo Chapter in May 2013 including the topics of (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements. Limited results were obtained from the presentation. The President of the Chapter said he would get back to the Company; however, he has yet to do so. The Company is not giving up on this and is trying to continue to follow up in order to further develop infrastructure and services being provided to the tribal area.

Line 922 – Feasibility and Sustainability Planning: The Company's actions to address feasibility and sustainability planning for the tribal land network are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss if the Tribe supported moving forward with facility expansion in order to provide additional or increased service offerings.

Line 923 – Marketing Services in an Culturally Sensitive Manner: The Company's actions to address the marketing of services in a culturally sensitive manner in the tribal land are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss if the Tribe had any suggestions or ideas for improving the company's marketing efforts and if they would they want to participate in jointly developing marketing materials.

Line 924 – Compliance with Right of Way Processes: As discussed above, the Company's actions to comply with the right-of-way processes for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss right-of-way processes for its tribal lands.

Line 925 – Compliance with Land Use Permitting Requirements: The Company's actions to comply with the land use permitting requirements for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss compliance with the land use permitting requirements for its tribal lands.

Line 926 – Compliance with Facility Siting Rules: The Company's actions to comply with the facilities siting rules for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss compliance with the siting rules for its tribal lands.

Line 927 – Compliance with Environmental Review Processes: The Company's actions to comply with the environmental review processes for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss compliance with the environmental review processes for its tribal lands.

Line 928 – Compliance with Cultural Preservation Review Processes: The Company's actions to comply with the cultural preservation review processes for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss compliance with the cultural preservation review processes for its tribal lands.

Line 929 – Compliance with Tribal Business and Licensing Requirements: The Company's actions to comply with the tribal business and licensing requirements for the tribal lands are as follows: As discussed above, the Company tried, with limited success, to engage the Tribe to discuss if the Tribe believes there are other licenses the Company should acquire to provide telecommunications services on its tribal lands.